

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

FlavaWorks Entertainment, Inc.,)	
Blatino Media, Inc.,)	
Plaintiffs,)	Case No. : 1:24-cv-09725
)	
)	Hon. Franklin U. Valderrama
v.)	
)	JURY TRIAL DEMANDED
John Doe 1, et al)	
Defendants.)	

**PLAINTIFFS' MOTION TO AMEND THE COMPLAINT AND CONVERT JOHN DOE
TO NAMED DEFENDANTS**

NOW COME Plaintiffs, FlavaWorks Entertainment, Inc. and Blatino Media, Inc.
(collectively, "Plaintiffs"), by and through their undersigned counsel, and respectfully move this
Honorable Court for leave to amend the Complaint to identify and substitute certain John Doe
Defendants with their actual names. In support thereof, Plaintiffs state as follows:

1. Plaintiffs initially filed this action listing several defendants as "John Doe" due to
the unavailability of their identities at the time of filing.

2. Through court-authorized discovery, including subpoenas directed to third-party
providers such as Google and NetZero, Plaintiffs have identified the following individuals as
corresponding to specific John Doe Defendants:

John Doe 9 (username: "dave858") is now identified as **David Tam**.

John Doe 29 (username: "umpf") is now identified as **Kevin Mediana**.

3. These identifications were made following a diligent analysis of documents obtained

through subpoenas and cross-referencing data with available account and usage information.

4. Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, a party may amend its pleading only with the opposing party's written consent or with leave of court, and such leave should be freely granted when justice so requires.

5. Amending the Complaint to name these defendants is necessary for effectuating service of process and for allowing this matter to proceed efficiently and justly.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant leave to amend the Complaint to substitute John Doe Defendants 9 and 29 with David Tam and Kevin Mediana, respectively, and direct the Clerk to issue summonses for the newly named Defendants. Plaintiffs also request any other relief the Court deems just and appropriate.

Dated: June 17, 2025

Respectfully Submitted,
FlavaWorks Entertainment, Inc.
Blatino Media, Inc.
/s/Hameed Odunewu
Attorney For Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Plaintiffs' Motion To Amend The Complaint And Convert John Doe To Named Defendants was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on June 17, 2025.

/s/ Hameed Odunewu